

Exhibit 15

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

AMAZON.COM, INC.; AMAZON.COM
SERVICES LLC; AND AMAZON WEB
SERVICES, INC.,

Defendants.

Case No. 7:24-CV-00030-ADA-DTG

JURY TRIAL DEMANDED

VIRTAMOVE, CORP.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 7:24-cv-00033-DC-DTG

JURY TRIAL DEMANDED

**DECLARATION OF MARK WOODWARD
IN SUPPORT OF PLAINTIFF VIRTAMOVE, CORP.'S OPPOSITION TO
MOTION TO TRANSFER VENUE**

I, Mark Woodward, declare and state as follows:

1. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. I am the former vice president of product engineering at AppZero, which is a predecessor of VirtaMove Corp.

3. I currently reside in Lyndhurst, Ontario, Canada, which is a small town near Ottawa, Ontario, Canada.

4. I am willing and expect to travel to Texas to testify in the above-captioned cases. I do not personally find this inconvenient. I do find cross-continental travel to the NDCA to be inconvenient.

5. I am willing and expect to travel to Texas in relation to Plaintiff's co-pending cases *VirtaMove, Corp. v. Google LLC*, No. 7:24-cv-33 (W.D. Tex); *VirtaMove, Corp. v. International Business Machines Corp.*, No. 2:24-cv-64 (E.D. Tex); and *VirtaMove, Corp. v. Hewlett Packard Enterprise Company*, No. 2:24-cv-96 (E.D. Tex). I expect to regularly travel to Texas to prepare for, attend hearings in, and testify in these cases, so I would not find travel for any one specific case in Texas to be inconvenient if I will be in Texas for other cases anyway. I have no specific plans to travel to the Northern District of California.

6. I would prefer to travel to Midland, Texas for trial instead of to the Northern District of California because I believe it will be both less expensive and closer.

7. For expenses, I have estimated my per-diem rates using the GSA website, and San Francisco looks to be approximately 50% more expensive. Below are true and correct screenshots of the GSA estimated rates for Midland, Texas and San Francisco, CA from:

www.gsa.gov/travel/plan-book/per-diem-rates/per-diem-rates-results?action=perdiems_report&fiscal_year=2024&state=CA&city=San%20Francisco, and
www.gsa.gov/travel/plan-book/per-diem-rates/per-diem-rates-results?action=

[perdiems_report&fiscal_year=2024&state=TX&city=midland.](#)

FY 2024 Per Diem Rates for San Francisco, California

Change fiscal year: **2025** **2024** **2023** or [New Search](#)



Daily lodging rates (excluding taxes) | October 2023 - September 2024



Cities not appearing below may be located within a county for which rates are listed. To determine the county a destination is located in, visit the [Census Geocoder](#).

Filter Results...

Primary Destination	County	2023 Oct	Nov	Dec	2024 Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
San Francisco	San Francisco	\$288	\$288	\$288	\$333	\$333	\$333	\$270	\$270	\$270	\$270	\$270	\$288

Showing 1 to 1 of 1 entries

FY 2024 Per Diem Rates for midland, Texas

Change fiscal year: **2025** **2024** **2023** or [New Search](#)



Daily lodging rates (excluding taxes) | October 2023 - September 2024



Cities not appearing below may be located within a county for which rates are listed. To determine the county a destination is located in, visit the [Census Geocoder](#).

Filter Results...

Primary Destination	County	2023 Oct	Nov	Dec	2024 Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Standard Rate	Applies for all locations without specified rates	\$107	\$107	\$107	\$107	\$107	\$107	\$107	\$107	\$107	\$107	\$107	\$107
Midland / Odessa	Midland / Andrews / Ector / Martin	\$183	\$183	\$183	\$183	\$183	\$183	\$183	\$183	\$183	\$183	\$183	\$183

Showing 1 to 2 of 2 entries

8. If I needed to travel a whole week for trial plus several days of preparation, then I estimate the resulting cost difference to be substantially less expensive in Midland, Texas.

9. I have used the website www.travelmath.com to estimate my straight-line flying times between Ottawa, ON, Canada to both Midland, Texas and to San Francisco, California. The following are true and correct excerpts showing that the estimated travel times and travel distances are more convenient for Midland, Texas (3 hours, 53 minutes to travel 1,688 miles) as

compared to San Francisco (5 hours, 23 minutes to travel 2,441 miles).

The flight time from Ottawa, Ontario to Midland, Texas is:

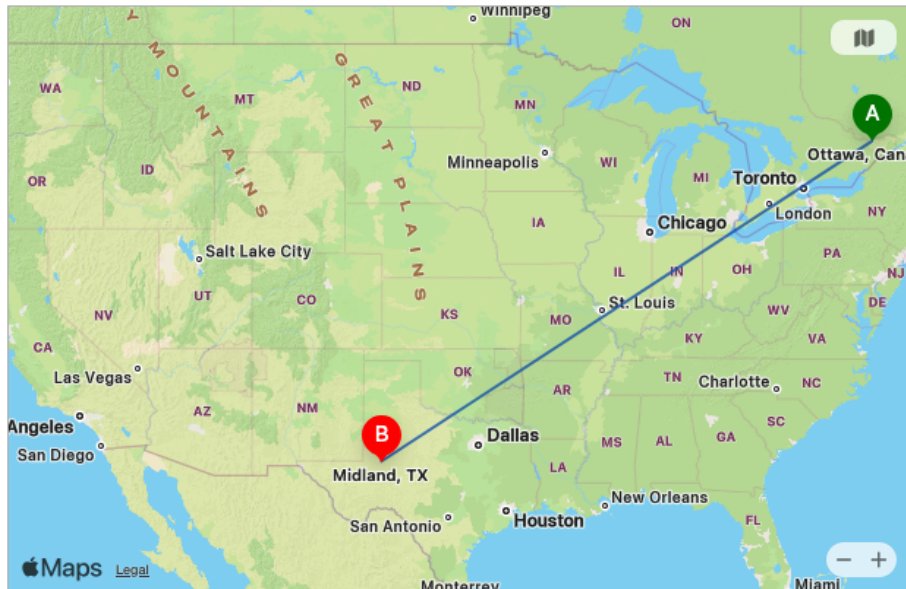
3 hours, 53 minutes

From:	<input type="text" value="Ottawa, Canada"/>	Get:	<input type="text" value="flight time"/>
To:	<input type="text" value="Midland, TX"/>		<input type="text" value="round-trip"/>
Depart:	<input type="text" value="09/13/2024"/>	From:	<input type="text" value="Ottawa, Canada"/>
Return:	<input type="text" value="09/19/2024"/>	To:	<input type="text" value="Midland, TX"/>
Get:	<input type="text" value="flight"/>		<input type="text" value="CALCULATE"/>

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Flight map from Ottawa, Canada to Midland, TX



...

Flying time from Ottawa, Canada to Midland, TX

The total flight duration from Ottawa, Canada to Midland, TX is **3 hours, 53 minutes**.

This assumes an average flight speed for a commercial airliner of 500 mph, which is equivalent to 805 km/h or 434 knots. It also adds an extra 30 minutes for take-off and landing. Your exact time may vary depending on wind speeds.

...

If you're planning a trip, remember to add more time for the plane to taxi between the gate and the airport runway. This measurement is only for the actual flying time. You should also factor in airport wait times and possible equipment or weather delays. If you're trying to figure out what time you'll arrive at the destination, you may want to see if there's a [time difference between Ottawa, Canada and Midland, TX](#).

The calculation of flight time is based on the straight line [distance from Ottawa, Canada to Midland, TX](#) ("as the crow flies"), which is about **1,688 miles** or **2 716 kilometers**.

Your trip begins in Ottawa, Canada.

It ends in Midland, Texas.

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The flight time from Ottawa, Ontario to San Francisco, California is:

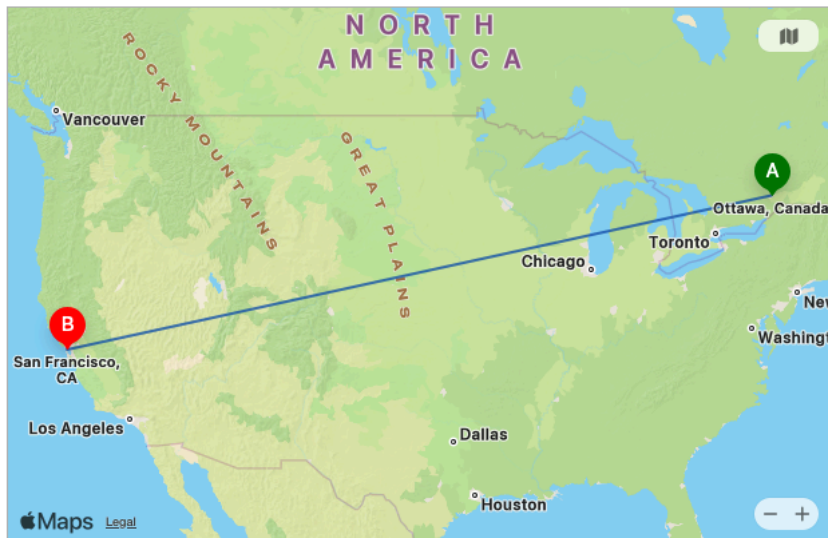
5 hours, 23 minutes

From: <input type="text" value="Ottawa, Canada"/>	Get: <input type="text" value="flight time"/>
To: <input type="text" value="San Francisco, CA"/> <input type="button" value="round-trip"/>	From: <input type="text" value="Ottawa, Canada"/>
Depart: <input type="text" value="09/13/2024"/>	To: <input type="text" value="San Francisco, CA"/> <input type="button" value="➤"/>
Return: <input type="text" value="09/19/2024"/>	
Get: <input type="text" value="flight"/>	<input type="button" value="SEARCH"/>
	<input type="button" value="CALCULATE"/>

Powered by MediaAlpha

...

Flight map from Ottawa, Canada to San Francisco, CA



...

Flying time from Ottawa, Canada to San Francisco, CA

The total flight duration from Ottawa, Canada to San Francisco, CA is **5 hours, 23 minutes**.

. . .

This assumes an average flight speed for a commercial airliner of 500 mph, which is equivalent to 805 km/h or 434 knots. It also adds an extra 30 minutes for take-off and landing. Your exact time may vary depending on wind speeds.

If you're planning a trip, remember to add more time for the plane to taxi between the gate and the airport runway. This measurement is only for the actual flying time. You should also factor in airport wait times and possible equipment or weather delays. If you're trying to figure out what time you'll arrive at the destination, you may want to see if there's a [time difference between Ottawa, Canada and San Francisco, CA](#).

The calculation of flight time is based on the straight line [distance from Ottawa, Canada to San Francisco, CA](#) ("as the crow flies"), which is about **2,441 miles** or **3 929 kilometers**.

Your trip begins in Ottawa, Canada.

It ends in San Francisco, California.

10. Based on these estimates, I believe that my travel to Texas will be much more convenient than travel to San Francisco, California because my travel will be less expensive and shorter in distance. For these reasons, I am unwilling to travel to San Francisco, California for trial.

11. I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct.

Executed on September 13, 2024 at LYNDHURST, Ontario, Canada.



Mark Woodward